

Gina McCarthy, Environmental Protection Agency Administrator
Attn: Harbor Comments, U.S. EPA
805 SW Broadway, Suite 500
Portland, OR 97205

Dear Ms. McCarthy:

Thank you for requesting public comment on the EPA's proposal for cleaning up the Willamette River Superfund site in Portland (OR) Harbor. I am grateful for the EPA's outreach effort to the communities affected, including my neighborhood (Kenton) of North Portland.

As I understand it, the EPA's recommended proposal (I) will remediate only 291 acres of the 2167-acre site and leave the rest to "monitored natural recovery." Although the proposed dredging and capping will mitigate some areas of river sediment, other areas will be left untouched. Here are my concerns:

1. **Large unremediated area.** The 1876 acres of "monitored natural recovery" will still contain PCBs, Dioxins, and furans that "stay in the environment for a long time," according to the EPA's proposal (page 3).
2. **No coastal cleanup.** Remediation of underwater sediment does not include removal of contaminants in the soil and under pavement along the coast (upland) of the river that continue to leach into the river.
3. **Unsafe fish.** Communities who fish the river for sport, support, or tradition can safely eat only a limited amount of their catch (8 oz. per person per month), while children, the elderly, nursing & pregnant mothers and others at risk are prohibited from eating any fish caught in the area. People who depend on Willamette River fish for dietary protein have increased cancer risk.
4. **No provision for earthquakes.** The Pacific Northwest is overdue for a 9.x magnitude subduction earthquake. Such an event is bound to severely disturb the Willamette River sediment and upland soils left to monitored natural recovery and will disrupt polluted areas that have been capped, releasing years of contaminants into the water and air.

On behalf of everyone who relies on the river for food, recreation, employment and culture, I urge the EPA to implement a plan that protects human health and the environment:

- Quickly implement methods to substantially and sustainably reduce or remove from the site contaminants that harm Willamette River (and Columbia River) resources.
- Perform ongoing compliance monitoring and cleanup upriver and downriver from the site.
- Ensure that fish are healthy and safe for all people to eat.
- Hold historic, current, and potential polluters accountable for a safer Portland Harbor.

Sincerely,

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Portland, OR 97217

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